

GIBSON, DUNN & CRUTCHER LLP
DHANANJAY S. MANTHRIPRAGADA, SBN 254433
dmanthripragada@gibsondunn.com
THOMAS F. COCHRANE, SBN 318635
tcochrane@gibsondunn.com
NASIM KHANSARI, SBN 320719
nkhansari@gibsondunn.com
333 South Grand Avenue
Los Angeles, California 90071-3197
Telephone: 213.229.7000
Facsimile: 213.229.7520

Attorneys for Defendants
DAMCO DISTRIBUTION SERVICES INC. and
MAERSK WAREHOUSING & DISTRIBUTION
SERVICES USA LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

ANTHONY JOSEPH SULLA, an
individual; Individually and on Behalf of
All Similarly Situated Individuals,

Plaintiffs,

v.

DAMCO DISTRIBUTION SERVICES,
INC., a foreign corporation; MAERSK
WAREHOUSING & DISTRIBUTION
SERVICES USA LLC, a foreign
corporation, and DOES 1 through 10,
inclusive,

Defendants.

CASE NO. 2:24-cv-04768
Assigned to Hon. George H. Wu

**JOINT NOTICE OF
SETTLEMENT AND
STIPULATION TO STAY**

Complaint served: Nov. 21, 2023
Complaint removed: June 6, 2024
Response deadline: Oct. 24, 2024

Pursuant to Local Rule 40-2, Plaintiff Anthony Joseph Sulla (“Plaintiff”) and Defendants Damco Distribution Services, Inc. and Maersk Warehousing & Distribution Services USA LLC (collectively, “Defendants”) (Plaintiff and Defendants are collectively referred to herein as the “parties”), by and through their counsel of record, hereby notify the Court that the parties have reached an agreement in principle to resolve Plaintiff’s individual claims against Defendants. The parties are currently working on memorializing the settlement in a long form settlement agreement.

Accordingly, the parties respectfully request that the Court issue an order (1) staying this action, except to accomplish the matters described above; and (2) vacating all current deadlines, including the deadline for Defendants to file their responsive pleading.

The parties further agree, subject to the Court’s approval, to file a joint notice of dismissal with prejudice as to Plaintiff’s claims and causes of action, and without prejudice as to the claims and causes of action of the putative class pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), or provide a progress report on the status of the settlement, within the next 45 days.

Dated: October 21, 2024

By: /s/ Vahan Mikayelyan
Vahan Mikayelyan

Attorney for Plaintiff Anthony Joseph Sulla

Dated: October 21, 2024

By: /s/ Thomas Cochrane
Thomas Cochrane

Attorneys for Defendants DAMCO
DISTRIBUTION SERVICES INC. and
MAERSK WAREHOUSING &
DISTRIBUTION SERVICES USA LLC

ECF ATTESTATION

I, Thomas Cochrane, hereby attest pursuant to Local Rule 5-4.3.4(a)(2) that the concurrence in the filing of this document has been obtained by the above signatories.

Dated: October 21, 2024

By: /s/ Thomas Cochrane
Thomas Cochrane

[PROPOSED] ORDER

Having received and considered the Joint Notice of Settlement and Request for Order Staying Action submitted by Plaintiff Anthony Joseph Sulla (“Plaintiff”) and Defendants Damco Distribution Services, Inc. and Maersk Warehousing & Distribution Services USA LLC (collectively, “Defendants”), the Court finds good cause exists to stay this action and vacate all deadlines as a result of the pending settlement.

Accordingly, IT IS HEREBY ORDERED that:

1. This action shall be stayed, except to accomplish finalization of the individual settlement agreement;
2. All currently pending deadlines, including Defendants’ responsive pleading deadline, are vacated; and
3. The Parties shall file a Joint Notice of Dismissal pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), or provide a progress report on the status of settlement, within the next 45 days.

IT IS SO ORDERED.

DATED: _____

Honorable George H. Wu
United States District Court Judge